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March 8, 2013

Kaitlin Eger  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re:Google Inc. NetPAC (C00428623) October Monthly Report.

Dear Ms. Eger:

I write in response to your letter dated February 25, 2013, regarding contributions disclosed by Google Inc. NetPAC ('NetPAC') on its 2012 October Monthly Report. In a separate letter to be filed concurrently, I respond to your letter dated February 6, 2013, regarding NetPACs' 2012 September Monthly Report.

Your letter suggests that NetPAC is affiliated with Motorola Solutions, Inc. Political Action Committee ('MOTPAC'). That is incorrect. NetPAC became affiliated with Motorola Mobility, Inc. PAC ('MMI PAC') in May 2012. At the time that NetPAC and MMI PAC affiliated, MMI PAC was not affiliated with MOTPAC; MMI PAC and MOTPAC disaffiliated on January 7, 2011, and have remained disaffiliated since that time. Because contributions made by MOTPAC subsequent to its disaffiliation with MMI PAC are not attributable to NetPAC or MMI PAC, the contributions by NetPAC to the Congressman Waxman Campaign Committee, Bob Goodlatte for Congress Committee, and Gillibrand for Senate complied with the per-election limits set forth at 2 U.S.C. 441a(a). See FEC Adv. Op. 1996-42 ('contributions by each SSF to the same candidate after their disaffiliation would only be attributed to the SSF making the contribution.').

On August 2, 2012, NetPAC contributed \$5,000 to Ted Cruz for Senate, designated for the 2012 General Election. On September 9, 2012, NetPAC contributed \$5,000 to Ted Cruz for Senate, designated for 2012 Primary Debt. NetPAC did not make any other contributions to Ted Cruz for Senate in connection with the 2012 Primary or General Elections. Therefore, NetPAC's contributions to Ted Cruz for Senate complied with the per-election limits set forth at 2 U.S.C. 441a(a).

I hope that this information resolves your questions about this report. If you require any additional information, please feel free to contact me directly.

Very truly yours,

Kate S. Keane  
Counsel for NetPAC